

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

PAUL R. DILGER, DERRICK J. HAMMETTER,
ANTOINETTE M. VINKAVICH, PATRICIA A.
SKRZYPCHAK, and DON TIEGS,

Individually and on behalf of all other
similarly situated persons or entities,

Case No. 2:17-cv-01753

Plaintiffs,

v.

IOD INCORPORATED, ABC INSURANCE CO.,
the fictitious name for an unknown insurance company,
VERISMA SYSTEMS, INC., DEF INSURANCE CO.,
the fictitious name for an unknown insurance company,
CIOX HEALTH, LLC, GHI INSURANCE CO., the
fictitious name for an unknown insurance company,

Defendants.

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO REMAND, AND
ALTERNATIVE MOTION FOR ENTRY OF DEFAULT AGAINST CIOX**

PLEASE TAKE NOTICE that the plaintiffs, Paul Dilger, et al., by their attorneys, Cannon & Dunphy, S.C. hereby move the court pursuant to 28 U.S.C. §1447(c) to remand this matter back to the Waukesha County Circuit Court, State of Wisconsin. Alternatively, plaintiffs move for entry of default against CIOX pursuant to Federal Rule of Civil Procedure 55(a). This Motion is based upon the entire record in this action, including the accompanying brief in support and Affidavit from Brett A. Eckstein.

Dated at Brookfield, Wisconsin this 16th day of January, 2018.

CANNON & DUNPHY, S.C.

Attorneys for Dilger Plaintiffs

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